

Jason E. Hirshon, OSB No. 052852
Email: jason@slindenelson.com
SLINDE NELSON
425 NW 10th Avenue, Suite 200
Portland, Oregon 97209
T: 503-417-7777
F: 503-417-4250

Attorneys for Non-Party, Masterpiece International, Ltd., LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

OREGON INTERNATIONAL AIR FREIGHT)	
CO., an Oregon corporation; OIA GLOBAL)	CASE NO. 3:21-cv-01480-SB
LOGISTICS-SCM, INC., an Oregon)	
corporation)	JUDGE STACIE F. BECKERMAN
)	
Plaintiffs,)	
)	
v.)	
)	
HEIDI BASSANO; MARIE BOVEY; LLOYD)	
BURKE; OLIVER BURKE; CHRISTOPHE)	
ESAYIAN; KIMBERLY KOMACKI;)	
MICHAEL LEHNERT; RAUL LUCENA;)	
MIKE RIZZO; TODD SWEENEY;)	
WILLIAM YANKOW; and DOES 1-20,)	
)	
Defendants.)	

**NON-PARTY MASTERPIECE INTERNATIONAL LTD., LLC’S
MOTION TO QUASH OR MODIFY PLAINTIFFS’ SUBPOENA**

Now comes nonparty Masterpiece International Ltd., LLC (“Masterpiece”), by and through undersigned counsel, who respectfully moves this Court for an Order quashing or modifying Plaintiffs Oregon International Air Freight Co. and OIA Global Logistics-SCM, Inc.’s (collectively “OIA Global”) Subpoena to Produce Documents and Information in a Civil Action (“Subpoena”) to non-party Masterpiece pursuant to Rule 45 (“Motion to Quash”). In the

alternative, Masterpiece requests this Court modify OIA Global's Subpoena as it deems proper. The reasons in support of this Motion to Quash, or in the alternative, modify OIA Global's Subpoena are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

By: s/Jason E. Hirshon
Jason E. Hirshon, OSB No. 052852
jason@slindenelson.com

Attorneys for Masterpiece International Ltd., LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2022, a true copy of the foregoing Response has been forwarded to the following via the Court's electronic filing system and via email:

Philip M. Guess
Elizabeth H. White
Alicia J. LeDuc
K&L GATES LLP
One SW Columbia Street, Suite 1900
Portland, OR 97204
Philip.guess@klgates.com
elizabeth.white@klgates.com
Alicia.leduc@klgates.com

Attorneys for Plaintiffs / Counter Defendants OIA Global Logistics-SCM Inc. & Oregon International Air Freight Co.

Courtney Angeli
Kristine M. Lambert
Buchanan Angeli Altschul & Sullivan
921 SW Washington Street, Suite 516
Portland, OR 97205
courtney@baaslaw.com
kristine@baaslaw.com

Attorneys for Defendant / Counter Claimant Christophe Esayan

James M. Barrett
Ogletree Deakins Nash Smoak & Stewart, P.C

222 SW Columbus Street, Suite 1500
Portland, OR 97201
james.barrett@ogletreedeakins.com

Martin B. Carroll
David J. Ogles
Fox Swibel Levin & Carroll LLP
200 West Madison St., Suite 3000
Chicago, IL 60606
mcarroll@foxswibel.com
dogles@foxwibel.com

Attorneys for Defendant Kimberly Komacki

Henry Brudney
HKM Employment Attorneys LLP
600 Stewart Street, Suite 901
Seattle, WA 98101
hbrudney@hkm.com

Charles W Hamilton, II
HKM Employment Attorneys LLP
1607 NE 41st Ave
Portland, OR 97232
chamilton@hkm.com

Jason A. Rittereriser
HKM Employment Attorneys LLP
600 Stewart Street, Suite 901, Suite 901
Seattle, WA 98101
jrittereiser@hkm.com

Attorneys for Defendant Todd Sweeney

Jamison R. McCune
Bodyfelt Mount, LLP
319 SW Washington Street, Suite 1200
Portland, OR 97204
mccune@bodyfeltmount.com

Attorney for Defendant William Yankow

Alina Salo
JJH Law, PC
514 NW 11th Ave., Ste. 201
Portland, OR 97209

alina.salo@jacksonlewis.com

Attorney for Defendant Marie Bovey

B. Scott Whipple
Whipple Law Office, LLC
1675 SW Marlow Avenue, Suite 201
Portland, OR 97225
scott@whipplelawoffice.com

Attorneys for Defendant / Counter Claimant, Lloyd Burke